

Kenneth A. Goldberg, Esq.
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 Attorneys For The Plaintiff
 UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF NEW YORK

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ONYENAEMEKA ETHELBERTH,	:	12-CV-4856 (PKC) (VMS)
	:	
Plaintiff,	:	
	:	NOTICE OF MOTION FOR
- against -	:	DEFAULT JUDGMENT
	:	
CHOICE SECURITY COMPANY, CHOICE	:	
GROUP, INC., CHOICE SECURITY	:	
SERVICES, INC., CHOICE SECURITY	:	
SERVICES INC., CHOICE SECURITY	:	
SERVICES, CHOICE SECURITY CO., and	:	
GEORGE OMOGUN (also known as	:	
OMONUWA OMOGUN, OMONUWA	:	
GEORGE OMOGUN, and GEORGE O.	:	
OMOGUN)	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, pursuant to Rules 54 and 55 of the Federal Rules of Civil Procedure, and Rule 55.2 of the Local Civil Rules, upon the accompanying Affirmation Of Kenneth A. Goldberg In Support Of Plaintiff's Renewed Application For Default Judgment And In Support Of Plaintiff's Application For Damages, Prejudgment Interest, Attorneys' Fees And Costs, Plaintiff's Proposed Findings Of Fact And Law, and upon the supporting papers filed therewith, Plaintiff, by his counsel, will move this Court before the Honorable Pamela K. Chen, U.S.D.J., in the United States District Court, Eastern District Of New York, 225 Cadman Plaza East, Brooklyn, N.Y. 11201, at such time as counsel may be heard, for a default judgment against all Defendants Choice Security Company, Choice Group, Inc., Choice Security Services, Inc., Choice Security Services Inc., Choice Security Services, and Choice Security Co. ("Choice Security Defendants" or "Choice") and George Omogun (also known as Omonuwa Omogun, Omonuwa George Omogun and George O. Omogun) ("Omogun"), jointly and severally, granting

and awarding Plaintiff all damages and relief, attorneys' fees, costs and interest requested therein,
and for such other and further relief as the Court deems proper.

Dated: New York, New York
March 30, 2016

By: /s/ Kenneth A. Goldberg

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